

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DYNAMIC DATA INNOVATIONS LLC,

Plaintiff,

v.

OLD NAVY, LLC,

Defendant.

Civil Action No. 2:24-cv-00712-JRG

(Lead Case)

JURY TRIAL DEMANDED

DYNAMIC DATA INNOVATIONS LLC,

Plaintiff,

v.

TRAVISMATHEW, LLC,

Defendant.

Civil Action No. 2:24-cv-00748-JRG

(Member Case)

JURY TRIAL DEMANDED

JOINT MOTION FOR ENTRY OF A DISCOVERY ORDER

Plaintiff Dynamic Data Innovations LLC, Defendant Old Navy, LLC and Defendant TravisMathew, LLC (collectively, the “Parties”) hereby jointly move for entry of the attached Discovery Order, pursuant to this Court’s Order dated October 23, 2024 (Dkt. No. 10).

Dated: November 21, 2024

Respectfully submitted,

By: /s/ C. Matthew Rozier

C. Matthew Rozier (CO 46854)

ROZIER HARDT McDONOUGH PLLC

1500 K Street, 2nd Floor

Washington, District of Columbia 20005

Telephone: (202) 316-1591, (404) 779-5305

Email: matt@rhmtrial.com

Jonathan Hardt (TX 24039906)

Danielle De La Paz (TX 24130716)

ROZIER HARDT McDONOUGH PLLC

712 W. 14th Street, Suite A

Austin, Texas 78701

Telephone: (210) 289-7541; (737) 304-8481

Email: hardt@rhmtrial.com

Email: danielle@rhmtrial.com

James F. McDonough, III (GA 117088)

ROZIER HARDT McDONOUGH PLLC

659 Auburn Avenue NE, Unit 254

Atlanta, Georgia 30312

Telephone: (404) 564-1866

Email: jim@rhmtrial.com

Attorneys for Plaintiff DYNAMIC DATA INNOVATIONS LLC

*Admitted to the Eastern District of Texas

Dated: November 21, 2024

Respectfully submitted,

By: /s/ Robert T. Cruzen

Robert T. Cruzen
Oregon State Bar No 080167
rob.cruzen@klarquist.com
KLARQUIST SPARKMAN, LLP
121 S.W. Salmon Street, Suite 1600
Portland, OR 97204
Telephone: (503) 595-5300
Fax: (503) 595-5301

Eric H. Findlay
State Bar No. 00789886
efindlay@findlaycraft.com
FINDLAY CRAFT, P.C.
7270 Crosswater Ave., Suite B
Tyler, TX 75703
Telephone: (903) 534-1100
Fax: (903) 534-1137

Attorneys for Defendant OLD NAVY, LLC

*Admitted to the Eastern District of Texas
e-signed with express permission

Dated: November 21, 2024

Respectfully submitted,

By: /s/ Lance E. Wyatt

Neil J. McNabnay
Texas Bar No. 24002583
Lance E. Wyatt
Texas Bar No. 24093397
Rodeen Talebi
Texas Bar No. 24103958
Riley J. Green
Texas Bar No. 24131352
Brandon S. Avers
Texas Bar No. 24135660

FISH & RICHARDSON P.C.
1717 Main Street, Suite 5000
Dallas, Texas 75201
mcnabnay@fr.com

JOINT MOTION FOR ENTRY OF A DISCOVERY ORDER

wyatt@fr.com
talebi@fr.com
rgreen@fr.com
avers@fr.com

J. Thad Heartfield
State Bar No. 09346800
thad@heartfieldlawfirm.com
THE HEARTFIELD LAW FIRM
2195 Dowlen Road
Beaumont, Texas 77706
Phone: 409.866.3318
Fax: 409.866.5789

David M. Stein
Texas Bar No. 00797494
E-mail: dstein@olsonstein.com
OLSON STEIN LLP
240 Nice Lane #301
Newport Beach, CA 92663
Phone: 949.887.4600

Attorneys for Defendant TRAVIS MATHEW, LLC

*Admitted to the Eastern District of Texas
e-signed with express permission

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this day, I caused the foregoing document to be electronically-filed with the Clerk of Court using the Court's CM/ECF system. As such, this document was served on all counsel who are deemed to have consented to electronic service.

Dated: November 21, 2024

By: /s/ C. Matthew Rozier
C. Matthew Rozier

CERTIFICATE OF CONFERENCE [L.R. CV-7(i)]

I HEREBY CERTIFY that the requirements of L.R. CV-7(h) have been complied with and the Motion is filed on behalf of the Parties. Counsel for the parties conferred by email on November 12, 2024, November 18, 2024, November 19, 2024, November 20, 2024, and November 21, 2024, regarding this Motion and the Parties are in agreement as to its substance, as indicated the signatures of counsel for all Parties.

Dated: November 21, 2024

By: /s/ C. Matthew Rozier
C. Matthew Rozier